UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YIT. DONG and RUH. ZHAO,

Plaintiffs

-against-

ANSWER 06 CV 4973

CCW FASHION INC; GOLDEN PHOENIX CLOTHING INC; 53 FASHION INC; FA MING LIU A.K.A. JIMMY LIU; BI FENG ZHOU A.K.A. JOYCE ZHOU; and MEI ZHEN LIU.

Defendants.

Defendants CCW Fashion Inc., Golden Phoenix Clothing Inc., Fa Ming Liu a/k/a Jimmy Liu and Bi Feng Zhou a/k/a Joyce Zhou, by its attorney, BRUCE FENTON, ESQ., as and for their Answer, allege as follows:

- 1. Defendants deny, upon information and belief, the allegations contained in paragraph "1" of the complaint except admit that Plaintiffs worked for Defendant CCW Fashion Inc. for varying periods between 2003 and May 2005.
- 2. Defendants deny, upon information and belief, the allegations contained in paragraphs"2" of the complaint.
 - 3. Defendants admit the allegations contained in paragraph "3" of the complaint.
 - 4. Defendants admit the allegations contained in paragraph "4" of the complaint.
 - 5. Defendants admit the allegations contained in paragraph "5" of the complaint.
 - 6. Defendants admit the allegations contained in paragraph "6" of the complaint.
- 7. Defendant CCW Fashion Inc. admits the allegations contained in paragraph "7" of the complaint.

- 8. Defendant Golden Phoenix admits it was a New York corporation but denies that it was succeeded by defendant CCW Fashion Inc.
- 9. Defendants admit the allegations contained in paragraph "9" of the complaint but denies that Defendant 53 Fashion was the successor to CCW Fashion and Golden Phoenix.
- 10. Defendants deny the allegations contained in paragraph "10" of the complaint except except admit that Defendant Fa Ming Liu was owner of the corporate Defendant CCW Fashion Inc. and Defendant Golden Phoenix.
 - 11. Defendants admit the allegations contained in paragraph "11" of the complaint.
 - 12. Defendants admit the allegations contained in paragraph "12" of the complaint.
- 13. Defendants deny the allegations contained in paragraph "13" of the complaint except admit that plaintiff are mostly piece workers.
 - 14. Defendants admit the allegations contained in paragraph '14 of the complaint.
 - 15. Defendants admit the allegations contained in paragraph "15" of the complaint.
 - 16. Defendants deny the allegations contained in paragraph "16" of the complaint.
 - 17. Defendants deny the allegations contained in paragraph "17" of the complaint.
 - 18. Defendants deny the allegations contained in paragraph "18" of the complaint.
- 19. Defendants deny the allegations contained in paragraph "19" of the complaint that Plaintiffs were not paid for their work.
- 20. Defendants admit the allegations contained in paragraph "20" of the complaint that Defendants were sometimes paid in cash.
 - 21. Defendants deny the allegations contained in paragraph "21" of the complaint.
 - 22. Defendants admit the allegations contained in paragraph "22" of the complaint.

- 23. Defendants admit the allegations contained in paragraph "23" of the complaint that there was a default in payment ut denies the balance of the allegations.
 - 24. Defendants deny the allegations contained in paragraph "24" of the complaint.
 - 25. Defendants deny the allegations contained in paragraph "25: of the complaint.
 - 26. Defendants deny the allegations contained in paragraph "26" of the complaint.
 - 27. Defendants deny the allegations contained in paragraph "27" of the complaint.
 - 28. Defendants deny the allegations contained in paragraph "28" of the complaint.
 - 29. Defendants deny the allegations contained in paragraph "29" of the complaint.
- 30. Defendants deny the allegations contained in paragraph "30" of the complaint that they failed to pay minimum wage to the Plaintiffs.
 - 31. Defendants deny the allegations contained in paragraph "31" of the complaint.
- 32. Defendants deny the allegations contained in paragraph "32" of the complaint that they failed to pay Plaintiff their wages.
 - 33. Defendants deny the allegations contained in paragraph "33" of the complaint.
 - 34. Defendants deny the allegations contained in paragraph "34" of the complaint.

WHEREFORE, the Defendants respectfully demand judgment

- 1) Dismissing the Plaintiff's complaint in its entirety.
- 2) Defendants shall have such other and further relief as to this Court deems just and proper, along with the costs and disbursements of this action.

Dated: New York, N.Y. Sept. 20, 2006

> Yours, etc. Bruce Fenton, Esq.BF 7160 Attorney for Defendants 48 Wall Street,, Suite 1125 New York, N.Y. 10005 (212) 918-4840

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